

Annex

Stage 2 Habitats Regulations Assessment (Appropriate Assessment)

Iteration number: **1**

Date assessment completed: **03 August 2017**

Completed by: **Tom Stephenson**

Relevant application number(s): **2016/91967 & 2017/91623**

Dunford Road, Hade Edge

Consideration of In-combination effects

Natural England considers the Local Plan HRA (March 2017) to be legally compliant with the Habitat Regulations. The HRA of the local plan considered in-combination effects in detail, including the proposed allocation ref: H288a the boundary of which is subject to the above planning applications. The assessment in chapter 5 and concluded in chapter 6 considers both recreational pressure and an increase in traffic in the context of the quantum and location of development proposed in the local plan. The local plan HRA concludes that there would be no adverse effect on the integrity of the South Pennines SPA (Phase 1&2) and South Pennine Moors SAC as a result of air pollution (increased traffic) or recreational pressure and urban edge impacts, on the basis of the quantum and location of the proposed allocations in the local plan. This site has therefore been considered in-combination with all local plan allocations, including those with extant planning permission.

The local plan HRA also explicitly considers in-combination effects with neighbouring authorities and concludes (paragraph 6.18)... *“On the basis of the HRA work that has been undertaken to date, in-combination effects related to air pollution, recreation, loss of habitat or disturbance are not expected. However, where HRA work has not yet been completed by neighbouring authorities, these studies will be reviewed as they develop.”*

The quantum of development proposed through the full planning application, 59 dwellings or 64 dwellings and a convenience store shown indicatively in the outline application are both lower than the indicative figure of 66 dwellings, taken into account in the local plan HRA. The local plan HRA alongside the planning application HRA is therefore considered to demonstrate that in combination effects have been satisfactorily addressed for this application.

In addition and with specific regard to the recreation issue raised in Natural England letter dated 23 August, the council has also undertaken a comprehensive search of both extant planning permissions not yet built and planning applications (until the time that the planning application was submitted) within 7km of the of the SPA and SAC. The indicative maximum capacity across this 7km area is 180 dwellings, mainly consisting of small sites and single units, (sites have been removed where they are included in the local plan HRA).

Therefore for recreational pressure and in-combination effects, if the same assumptions are applied as the local plan HRA of 13 annual trips to the South Pennines per capita and an average household size of 2.3/2.4, the 180 units may result in 5,232-5,616 additional trips per year. This additional trips figure set within the context of the local plan HRA conclusions which highlights that there are 4.3m trips per year from Kirklees to the South Pennines, demonstrates that the planning application HRA

can satisfactorily rule out in combination effects as a result of planning applications (2017/91623 and 2016/91967).